

# EXHIBIT C

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**From:** Mario Gazzola  
**Sent:** Monday, September 16, 2024 11:16 PM  
**To:** David Forrest  
**Cc:** Michael Carlinsky; Laura Santos-Bishop; Pedro Souza; John Piskora  
**Subject:** RE: SDN Limited v. IOV Labs Limited, 24-cv-06089

Counsel:

We are concerned that your request for all relevant agreements suggests that you did not review them prior to filing claims in breach of an obligation to arbitrate. As you know, we are under no obligation to provide you with documents that your clients have apparently not shared with you.

Nevertheless, now that you are on notice of the arbitration agreement, we expect that, consistent with counsel's obligations under Rule 11, you will conduct a reasonable inquiry of your clients prior to filing a full complaint, including evaluating under Rule 11(b)(1) that your clients' claims in breach of the arbitration provision are "not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation."

We reserve all rights.

Best,  
Mario

**Mario O. Gazzola**  
212-849-7102 Direct  
919-360-1686 Cell

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**From:** David Forrest <dforrest@loeb.com>  
**Sent:** Tuesday, September 3, 2024 10:00 AM  
**To:** Mario Gazzola <mariogazzola@quinnemanuel.com>  
**Cc:** Michael Carlinsky <michaelcarlinsky@quinnemanuel.com>; Laura Santos-Bishop <laurasantosbishop@quinnemanuel.com>; Pedro Souza <pedrosouza@quinnemanuel.com>; John Piskora <jpiskora@loeb.com>  
**Subject:** RE: SDN Limited v. IOV Labs Limited, 24-cv-06089

[EXTERNAL EMAIL from [dforrest@loeb.com](mailto:dforrest@loeb.com)]

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Mario,

We are in receipt of your August 29, 2024 letter. While we evaluate your request, please send us copies of any agreements between your clients and either Steven Nerayoff or SDN Limited.

David

**David Forrest**  
*Attorney At Law*



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**From:** Mario Gazzola <[mariogazzola@quinnemanuel.com](mailto:mariogazzola@quinnemanuel.com)>  
**Sent:** Thursday, August 29, 2024 6:40 PM  
**To:** John Piskora <[jpiskora@loeb.com](mailto:jpiskora@loeb.com)>; David Forrest <[dforrest@loeb.com](mailto:dforrest@loeb.com)>  
**Cc:** Michael Carlinsky <[michaelcarlinsky@quinnemanuel.com](mailto:michaelcarlinsky@quinnemanuel.com)>; Laura Santos-Bishop <[laurasantosbishop@quinnemanuel.com](mailto:laurasantosbishop@quinnemanuel.com)>; Pedro Souza <[pedrosouza@quinnemanuel.com](mailto:pedrosouza@quinnemanuel.com)>  
**Subject:** RE: SDN Limited v. IOV Labs Limited, Index No. 607805/2024

Counsel:

Please see attached correspondence.

**Mario O. Gazzola**  
212-849-7102 Direct  
919-360-1686 Cell

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**From:** Mario Gazzola  
**Sent:** Thursday, August 22, 2024 3:40 PM  
**To:** [jpiskora@loeb.com](mailto:jpiskora@loeb.com); [dforrest@loeb.com](mailto:dforrest@loeb.com)  
**Cc:** Michael Carlinsky <[michaelcarlinsky@quinnemanuel.com](mailto:michaelcarlinsky@quinnemanuel.com)>; Laura Santos-Bishop <[laurasantosbishop@quinnemanuel.com](mailto:laurasantosbishop@quinnemanuel.com)>; Pedro Souza <[pedrosouza@quinnemanuel.com](mailto:pedrosouza@quinnemanuel.com)>  
**Subject:** SDN Limited v. IOV Labs Limited, Index No. 607805/2024

Counsel:

We have been retained by RSK Labs Limited in connection with the above-captioned action. We write to inform you that Raul Laprida, whom you purportedly served in Tennessee on July 26, is not employed by RSK Labs Limited. Rather, he is employed by a different entity. And contrary to your affirmation to the Court, Dkt. 6 ¶ 6, Mr. Laprida is not an officer or director of RSK Labs Limited, or any other Rootstock entity.

Plaintiffs' attempt to serve Mr. Laprida with process for an entity with which he is not affiliated was therefore ineffective.

Best,

**Mario O. Gazzola**

*Associate*

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